

CLOSURE PLAN

CFR 257.102(b)

Primary Bottom Ash Pond

Welsh Power Plant
Pittsburg, Texas

October 2016
Revised November 2020

Prepared for: Southwest Electric Power Company - Welsh Plant

Pittsburg, Texas

Prepared by: American Electric Power Service Corporation

1 Riverside Plaza

Columbus, OH 43215



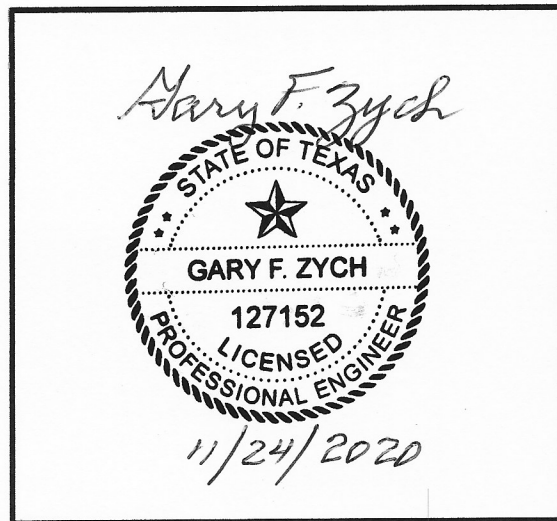
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CLOSURE PLAN
CFR 257.102(b)
WELSH POWER PLANT
PRIMARY BOTTOM ASH POND

PREPARED BY *Gary F. Zych* DATE 11/22/2020
Gary F. Zych, P.E.

REVIEWED BY *Arthur W. Rentzsch* DATE 11/23/2020
Arthur W. Rentzsch

APPROVED BY *Gary F. Zych* DATE 11/24/2020
Gary F. Zych, P.E.
Section Manager – AEP Geotechnical Engineering



I certify to the best of my knowledge, information, and belief that the information contained in this closure plan meets the requirements of 40 CFR § 257.102(b)

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1.0 OBJECTIVE

This report was prepared by AEP- Geotechnical Engineering Services (GES) section to fulfill requirements of CFR 257.102(b) for Closure Plans of Existing CCR Surface Impoundments

2.0 DESCRIPTION OF THE CCR UNIT

The AEP J. Robert Welsh Plant is located in southern Titus County, approximately 8 miles northeast of Pittsburg, Texas, and approximately two miles northwest of Cason, Texas. It is owned and operated by Southwest Electric Power Company (SWEPCO). The facility operates two surface impoundments for storing CCR materials called the Primary Bottom Ash pond and the Bottom Ash Storage pond. This report addresses the closure plan for the Primary Bottom Ash Pond. The Primary Bottom Ash pond CCR unit is located southwest of the Plant and directly west of the Welsh Reservoir.

The Primary Bottom Ash pond is bounded by natural ground surface (topographically higher areas) to the north and west, and embankment dikes to the south and east. The elevation at the top of embankment along the crest area is approximately 340.0 feet above msl.

3.0 DESCRIPTION OF CLOSURE PLAN 257.102(b)(1)(i)

[A narrative description of how the CCR unit will be closed in accordance with this section]

Closure of the Welsh Power Plant Primary Bottom Ash Pond will be completed by CCR removal.

The closure of the Primary Bottom Ash Pond will include removal of CCR materials within the pond by dredging and/or mechanical means.

4.0 CLOSURE BY REMOVAL 257.102 (b)(1)(ii)

[If closure of the CCR unit will be accomplished through removal of CCR from the CCR unit, a description of the procedures to remove the CCR and decontaminate the CCR unit in accordance with paragraph (c) of this section.]

Closure will include removal of all CCR from the CCR unit. The removal of all CCR unit will be accomplished by dredging and/or mechanical means as decided by the construction contractor with approval by the engineer and AEP. Prior to actual removal, the initial work will include rerouting of non-CCR flows and stormwater runoff that discharge into the pond. The CCR material will be either hauled and placed at the onsite CCR landfill or hauled offsite for beneficial reuse.

A 3rd party QAQC consultant will verify the removal of the CCR material. After verification of CCR removal, 12 inches of bottom soil will be removed as part of the closure of the CCR surface impoundment.

4.1 CLOSURE PERFORMANCE STANDARDS 257.102 (c)

[An owner or operator may elect to close a CCR unit by removing and decontaminating all areas affected by releases from the CCR unit. CCR removal and decontamination of the CCR unit are complete when constituent concentrations throughout the CCR unit and any areas affected by releases from the CCR unit have been removed and groundwater monitoring concentrations do not exceed the groundwater protection standard established pursuant to §257.95(h) for constituents listed in appendix IV to this part.]

Closure of the CCR unit will be completed when all CCR materials in the unit and any soils affected by releases from the CCR unit have been removed and groundwater monitoring demonstrates that all concentrations of the assessment monitoring constituents listed in appendix IV to part 257 do not exceed either statistically equivalent background levels or MCLs for two consecutive sampling events using the statistical procedures in § 257.93(g).

5.0 ESTIMATE OF MAXIMUM CCR VOLUME 257.102 (b)(1)(iv)

[An estimate of the maximum inventory of CCR ever on-site over the active life of the CCR unit.]

The estimated maximum CCR volume on-site is 530,000 cubic yards for the Primary Bottom Ash Pond.

6.0 ESTIMATE OF LARGEST AREA OF CCR REQUIRING COVER 257.102 (b)(1)(v)

[An estimate of the largest area of CCR unit ever requiring a final cover]

This pond will be closed by removal of CCR materials as such this section is not applicable.

7.0 CLOSURE SCHEDULE 257.102(b)(1)(vi)

[A schedule for completing all activities necessary to satisfy the closure criteria in the section, including an estimate of the year in which all closure activities for the CCR unit will be completed. The schedule should provide sufficient information to describe the sequential steps that will be taken to close the CCR unit, including identification of major milestones such as coordinating with and obtaining necessary approvals and permits from other agencies, the dewatering and stabilization phases of the CCR surface impoundment closure, or installation of the final cover system, and the estimated timeframes to complete each step or phase of the CCR unit closure.

Table below summarizes the major tasks and durations associated with closing the PBAP.

Initiate PBAP Closure	January 2025
Closure Planning and Engineering	6 months
Environmental and Construction Permits	15 months
Spec, bid, and Award construction contracts	6 months
Commence CCR Closure Phase 1 Construction no later than	February 2027
Dewatering and Wastewater/Stormwater Diversion	3 months
Pond Segregation Berm	2 months
Phase 1 CCR Removal	6 months
Phase 1 Impacted Soil Removal	4 months
Cease Coal Combustion; Start of Phase 2	March 2028
Phase 2 Dewatering	2 months
Phase 2 CCR material removal in remaining PBAP	4 months
Phase 2 Impacted soil removal	3 months
Site Regrading and Restoration	4 months
Complete closure by	October 17, 2028